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21WE-CC00082 - FORD AND LOFTON V. ZOUICHA AND JAZLINK, INC. (E-CASE)

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Case Header	Parties & Attorneys	Docket Entries	Charges, Judgments & Sentences	Service Information	Filings Due	Scheduled Hearings & Trials	Civil Judgments	Garnishments/ Execution
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11/24/2021

- ☐ **Judge/Clerk - Note**  
MOTION AND ORDER FOR SPS E-MAILED TO JUDGE THIS DATE. VR
- ☐ **Summons Issued-Circuit**  
Document ID: 21-SMCC-874, for JAZLINK, INC..
- ☐ **Summons Issued-Circuit**  
Document ID: 21-SMCC-873, for ZOUICHA, MOHAMMED.
- ☐ **Filing Info Sheet eFiling**  
**Filed By:** GENE SCOTT HOU
- ☐ **Note to Clerk eFiling**  
**Filed By:** GENE SCOTT HOU
- ☐ **Proposed Order Filed**  
PROPOSED ORDER APPOINTING SPECIAL PROCESS SERVER.  
**Filed By:** GENE SCOTT HOU  
**On Behalf Of:** FORD DURAND, DAVID LOFTON
- ☐ **Motion Special Process Server**  
Motion for Appointment of Special Process Server.  
**Filed By:** GENE SCOTT HOU
- ☐ **Pet Filed in Circuit Ct**  
Petition.  
**Filed By:** GENE SCOTT HOU
- ☐ **Order - Special Process Server**  
TANYA WISEMAN-SPS  
**Filed By:** MICHAEL O'BRIEN HENDRICKSON
- ☐ **Judge Assigned**

Case 6:22-cv-03010-MDH Document 1-1 Filed 01/13/22 Page 1 of 12



# Your Missouri Courts


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## 21WE-CC00082 - FORD AND LOFTON V. ZOUICHA AND JAZLINK, INC. (E-CASE)

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Further information may be available in the docket entries portion of Case.net. Because service of process may establish legal obligations, you may want to examine the original case file in the clerk's office.

Displaying 1 thru 2 of 2 service records returned for case 21WE-CC00082.

### Issuance

**Issued To:** ZOUICHA , MOHAMMED

**Date Issued:** 11/24/2021

**Document** Summons Civil Case-To Dft-  
**Issued:** Res

**Due Date:** 12/24/2021

**Document ID:** 21-SMCC-873

**Return (Information not yet on file)**

### Issuance

**Issued To:** JAZLINK, INC.

**Date Issued:** 11/24/2021

**Document** Summons Civil Case-To Dft-  
**Issued:** Res

**Due Date:** 12/24/2021

**Document ID:** 21-SMCC-874

**Return (Information not yet on file)**

Displaying 1 thru 2 of 2 service records returned for case 21WE-CC00082.

IN THE CIRCUIT COURT OF WEBSTER COUNTY  
STATE OF MISSOURI

DURAND FORD and	)	
DAVID LOFTON	)	
	)	
Plaintiffs,	)	Cause Number:
	)	
v.	)	Division:
	)	
MOHAMMED ZOUICHA,	)	
	)	
Serve At:	)	
<b>Mohammed Zouicha</b>	)	
<b>1033 Rue Valois</b>	)	Jury Trial Demanded
<b>Vaudreuil-Dorion, QC J7V 8P2</b>	)	
	)	
and	)	
	)	
JAZLINK, INC.,	)	
	)	
Serve At:	)	
<b>Jazlink, Inc.</b>	)	
<b>1033 Rue Valois</b>	)	
<b>Vaudreuil-Dorion, QC J7V 8P2</b>	)	
	)	
Defendants.	)	

**PETITION**

COME NOW Plaintiffs Durand Ford (hereinafter "Plaintiff Ford") and David Lofton (hereinafter "Plaintiff Lofton"), by and through the undersigned counsel, and for Plaintiffs' Petition against the Defendants, Mohammed Zouicha (hereinafter "Defendant Zouicha") and Jazlink, Inc. (hereinafter "Defendant Jazlink"), state as follows:

**GENERAL ALLEGATIONS**

1. This cause of action arises from a motor vehicle accident that occurred on February 4, 2018, at approximately 2:40 p.m. in Webster County, State of Missouri.
2. The aforesaid motor vehicle accident occurred at or near I-44 East in Webster County, State of Missouri.

3. Venue is proper in the Circuit Court of Webster County pursuant to R.S.Mo. § 508.010.4 as Plaintiffs were first injured in Webster County.

4. On said date and time, Plaintiff Lofton was operating a 2019 General Motors Sierra 2500 HD and was traveling eastbound on I-44.

5. On said date and time, Plaintiff Ford was seated in the front passenger seat of the vehicle being operated by Plaintiff Lofton.

6. On said date and time, Defendant Zouicha was operating a 2016 Volvo VNL, owned by Defendant Jazlink, and was traveling eastbound on I-44.

7. On said date and time, Defendant Zouicha was an employee of Defendant Jazlink and was acting within the course and scope of his employment.

8. Defendant Jazlink, as employer of Defendant Zouicha, is vicariously liable and otherwise responsible for the negligent actions of its employee, Defendant Zouicha, while acting within the course and scope of his employment with Defendant Jazlink.

9. At all times herein mentioned Plaintiffs' vehicle was operated in a reasonable and prudent manner, with due caution and regard for the motor vehicle laws of the State of Missouri.

10. Plaintiffs' vehicle was slowing to a stop due to snow and congested traffic ahead.

11. Defendants' vehicle came into collision with the rear of Plaintiffs' vehicle.

12. Plaintiffs' vehicle was violently pushed forward and sent spinning due to the impact with Defendants' vehicle, which set in motion a chain reaction of collisions involving multiple vehicles.

13. Defendant Zouicha had a duty to drive with the highest degree of care for the safety of the Plaintiffs and others.

14. The aforesaid collision occurred as a direct and proximate result of the negligence, carelessness, recklessness and fault of Defendant Zouicha in the following respects:

- a. Defendant Zouicha's vehicle came into collision with the rear of Plaintiffs' vehicle;
- b. Defendant Zouicha drove at an excessive speed;
- c. Defendant Zouicha failed to keep a careful lookout;
- d. Defendant Zouicha failed to pay adequate attention;
- e. Defendant Zouicha drove too fast for conditions;
- f. Defendant Zouicha failed to yield the right-of-way;
- g. Defendant Zouicha was following the Plaintiffs' vehicle too closely;
- h. Defendant Zouicha knew or could have known that there was a reasonable likelihood of collision in the time thereafter to have stopped, swerved, slackened speed, sounded a warning, or some combination of the above, but Defendant Zouicha failed to do so;
- i. Defendant Zouicha failed to obey the Rules of the Road; and
- j. Defendant Zouicha failed to exercise the highest degree of care.

### **COUNT I – DURAND FORD**

COMES NOW Plaintiff Durand Ford, by and through the undersigned counsel, and for Count I of Plaintiffs' Petition against the Defendants, Mohammed Zouicha and Jazlink, Inc., states as follows:

15. Plaintiff Ford re-alleges and incorporates by reference paragraphs 1 – 14 of the allegations above as if they were fully set forth herein.

16. As a direct and proximate result of Defendant Zouicha's carelessness and negligence, Plaintiff Ford was caused to suffer injuries to his neck, back, arms, hands, shoulders, and generally the associated bones, discs, joints, tendons, tissues, nerves, membranes, ligaments, vessels and parts thereof, were severely bruised, contused, sprained, cracked, wrenched, swollen,

weakened, twisted and torn in the aforementioned parts of the body; Plaintiff Ford suffered serious, permanent and disabling injuries; all of said injuries are serious, permanent and progressive in nature; the nature and use of all said parts of the body are severely impaired and made painful; and Plaintiff Ford's enjoyment of life has been diminished.

17. As a direct and proximate result of Defendant Zouicha's carelessness and negligence as aforesaid, Plaintiff Ford has incurred medical expenses in the amount of \$117,417.02 and in the future will be caused to incur further medical expenses in an amount presently undetermined.

WHEREFORE, Plaintiff Durand Ford prays for judgment against Defendants Mohammed Zouicha and Jazlink, Inc., in a fair and reasonable amount in excess of \$25,000.00, together with his costs herein, and for such other and further relief as this Court deems just and proper.

### **COUNT II – DAVID LOFTON**

COMES NOW Plaintiff David Lofton, by and through the undersigned counsel, and for Count II of Plaintiffs' Petition against the Defendants, Mohammed Zouicha and Jazlink, Inc., states as follows:

18. Plaintiff Lofton re-alleges and incorporates by reference Paragraphs 1 – 17 of the allegations above as if they were fully set forth herein.

19. As a direct and proximate result of Defendant Zouicha's carelessness and negligence, Plaintiff Lofton was caused to suffer injuries to his knees, shoulders, elbows, wrists, neck, back, and generally the associated bones, discs, joints, tendons, tissues, nerves, membranes, ligaments, vessels and parts thereof, were severely bruised, contused, sprained, cracked, wrenched, swollen, weakened, twisted and torn in the aforementioned parts of the body; Plaintiff Lofton suffered serious, permanent and disabling injuries; all of said injuries are serious, permanent and

progressive in nature; the nature and use of all said parts of the body are severely impaired and made painful; and Plaintiff Lofton's enjoyment of life has been diminished.

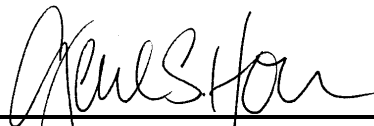
20. As a direct and proximate result of Defendant Zouicha's carelessness and negligence as aforesaid, Plaintiff Lofton has incurred medical expenses in the amount of \$191,286.99 and in the future will be caused to incur further medical expenses in an amount presently undetermined.

21. As a direct and proximate result of Defendant Zouicha's carelessness and negligence as aforesaid, Plaintiff Lofton suffered property damage to his vehicle, loss of use of said vehicle, and diminution of value of said vehicle.

WHEREFORE, Plaintiff David Lofton prays for judgment against Defendants Mohammed Zouicha and Jazlink, Inc., in a fair and reasonable amount in excess of \$25,000.00, together with his costs herein, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

MISSOURI INJURY LAW FIRM, LLC



---

Gene S. Hou, #51314  
Robert E. Wann, III #70405  
1444 Gravois Road  
High Ridge, MO 63049  
(636) 333-1717  
(636) 333-1716 Fax  
[moinjurylawfirm@att.net](mailto:moinjurylawfirm@att.net)  
[rob@injurylawyers-stlouis.com](mailto:rob@injurylawyers-stlouis.com)  
Attorneys for Plaintiffs

IN THE CIRCUIT COURT OF WEBSTER COUNTY  
STATE OF MISSOURI

DURAND FORD and	)	
DAVID LOFTON,	)	
	)	
Plaintiffs,	)	Cause Number:
	)	
v.	)	Division:
	)	
MOHAMMED ZOUICHA and	)	
JAZLINK, INC.,	)	
	)	
Defendants.	)	

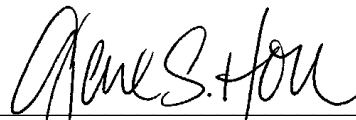
**MOTION OF PLAINTIFFS FOR APPOINTMENT OF SPECIAL PROCESS SERVER**

COME NOW the Plaintiffs, by and through counsel, and move the Court to appoint **Tanya Wiseman, a bailiff of justice member of the firm Paquette & Associates, huissier de justice S.E.N.C.R.L., 215 Rue Saint-Jacques, Suite 600, Montreal (Quebec) H2Y 1M6, (514) 982-3173;** to serve process on the Defendants, MOHAMMED ZOUICHA and JAZLINK, INC.. In support of Plaintiffs' Motion, Plaintiffs state as follows:

1. The party who will serve the process in this case is over the age of eighteen and is not a party to this action.

WHEREFORE, Plaintiffs move this Court for an Order appointing **Tanya Wiseman, a bailiff of justice member of the firm Paquette & Associates, huissier de justice S.E.N.C.R.L., 215 Rue Saint-Jacques, Suite 600, Montreal (Quebec) H2Y 1M6, (514) 982-3173;** to serve process in this matter, and for such other and further relief at the Court deems just and proper.

MISSOURI INJURY LAW FIRM, LLC



Gene S. Hou, #51314  
1444 Gravois Road  
High Ridge, MO 63049  
(636) 333-1717  
(636) 333-1716 Fax  
moinjurylawfirm@att.net  
Attorney for Plaintiffs

So Ordered: \_\_\_\_\_  
Judge

Date: \_\_\_\_\_



IN THE CIRCUIT COURT OF WEBSTER COUNTY  
STATE OF MISSOURI

DURAND FORD and	)	
DAVID LOFTON,	)	
	)	
Plaintiffs,	)	Cause Number:
	)	
v.	)	Division:
	)	
MOHAMMED ZOUICHA and	)	
JAZLINK, INC.,	)	
	)	
Defendants.	)	

**ORDER APPOINTING SPECIAL PROCESS SERVER**

Upon motion of Plaintiffs, the Court hereby appoints **Tanya Wiseman, a bailiff of justice member of the firm Paquette & Associates, huissier de justice S.E.N.C.R.L., 215 Rue Saint-Jacques, Suite 600, Montreal (Quebec) H2Y 1M6, (514) 982-3173;** to serve process on the Defendants, MOHAMMED ZOUICHA and JAZLINK, INC.

\_\_\_\_\_  
Judge

\_\_\_\_\_  
Date

21WE-CC00082

IN THE CIRCUIT COURT OF WEBSTER COUNTY  
STATE OF MISSOURI

DURAND FORD and	)	
DAVID LOFTON,	)	
	)	
Plaintiffs,	)	Cause Number:
	)	
v.	)	Division:
	)	
MOHAMMED ZOUICHA and	)	
JAZLINK, INC.,	)	
	)	
Defendants.	)	

**ORDER APPOINTING SPECIAL PROCESS SERVER**

Upon motion of Plaintiffs, the Court hereby appoints **Tanya Wiseman, a bailiff of justice member of the firm Paquette & Associates, huissier de justice S.E.N.C.R.L., 215 Rue Saint-Jacques, Suite 600, Montreal (Quebec) H2Y 1M6, (514) 982-3173; to serve process on the Defendants, MOHAMMED ZOUICHA and JAZLINK, INC.**



Judge

11/24/21

Date



Webster County




# IN THE 30TH JUDICIAL CIRCUIT, WEBSTER COUNTY, MISSOURI

Judge or Division: MICHAEL O'BRIEN HENDRICKSON	Case Number: 21WE-CC00082
Plaintiff/Petitioner: FORD DURAND	Plaintiff's/Petitioner's Attorney/Address GENE SCOTT HOU SUITE 175 13500 RIVERPORT DRIVE MARYLAND HEIGHTS, MO 63146
Defendant/Respondent: MOHAMMED ZOUICHA	Court Address: 101 S. CRITTENDEN -RM 22 CIVIL 859-2006 CRIM 859-2041 MARSHFIELD, MO 65706
Nature of Suit: CC Pers Injury-Vehicular	

(Date File Stamp)

## Summons in Civil Case

**The State of Missouri to: MOHAMMED ZOUICHA**  
**Alias:**  
 1033 RUE VALOIS  
 VANDREUIL-DORION, QC J7V 8P2

**COURT SEAL OF**  
  
**WEBSTER COUNTY**

**You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.**

11/24/2021  
Date

/s/Vickie Replogle Deputy Clerk  
Clerk

Further Information:

### Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other: \_\_\_\_\_.

Served at \_\_\_\_\_ (address)  
 in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

### Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

**Total** \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.




# IN THE 30TH JUDICIAL CIRCUIT, WEBSTER COUNTY, MISSOURI

Judge or Division: MICHAEL O'BRIEN HENDRICKSON	Case Number: 21WE-CC00082
Plaintiff/Petitioner: FORD DURAND	Plaintiff's/Petitioner's Attorney/Address GENE SCOTT HOU SUITE 175 13500 RIVERPORT DRIVE MARYLAND HEIGHTS, MO 63146
Defendant/Respondent: MOHAMMED ZOUICHA	Court Address: 101 S. CRITTENDEN -RM 22 CIVIL 859-2006 CRIM 859-2041 MARSHFIELD, MO 65706
Nature of Suit: CC Pers Injury-Vehicular	

(Date File Stamp)

## Summons in Civil Case

**The State of Missouri to: JAZLINK, INC.**  
Alias:  
1033 RUE VALOIS  
VANDREUIL-DORION, QC J7V 8P2

**COURT SEAL OF**  
  
**WEBSTER COUNTY**

**You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.**

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Date

/s/Vickie Replogle Deputy Clerk  
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- ☐ other: \_\_\_\_\_.

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

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**Must be sworn before a notary public if not served by an authorized officer:**

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(Seal)

My commission expires: \_\_\_\_\_

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